



## United States Department of the Interior

### BUREAU OF LAND MANAGEMENT

Moab Field Office

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Moab, Utah 84532

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RETURN RECEIPT REQUESTED

John Glascock, President

Sweetwater Resources, LLC

P.O. Box 2498

Laramie, Wyoming 82073

**RE: More Information Required for Green River Potash Exploration Plan**

Dear Mr. Glascock:

The Bureau of Land Management has reviewed American Potash, LLC's Green River Potash Exploration Plan dated October 2012. We have determined that the Exploration Plan is incomplete and per 43 CFR 3505.45 (f) we are asking for the following information:

1. **Pages 1-2 Contacts:** The Exploration Plan lists seven individuals, but does not identify specifically which of these individuals are responsible for operations under the plan and to whom the BLM will deliver notices and orders. The exploration plan must specifically identify the responsible party and provide a mailing address for American Potash (see 43 CFR 3505.45 (a)).
2. **Page 11 Characterization of Potash Resources:** Provide information regarding how, where and for how long American Potash intends to store its core samples (43 CFR 3593.1(a)). As part of drilling, we will require American Potash to provide documentation regarding any water encountered during drilling.

3. **Page 13 Figure 6:** Consider renaming the drill hole locations. Some of the names, especially Hey Joe and Keg Springs will be confusing to the public. Keg Springs is more associated with Keg Springs Bottom which is on the Green River and Keg Springs Canyon, a wilderness study area located on the west side of the Green River. Hey Joe is more associated with the mine that is at bottom of Hey Joe canyon near the Green River. The names may bring unneeded controversy to the project.
4. **Page 16 – Timetable:** The timetable needs to be updated and should reflect the actual timeframe expected for all project-related activities scheduled to occur on BLM-managed lands. Items to include are: a general time of year when project would start, which hole would be drilled first, estimated number of days per hole, and estimated number of days to complete reclamation and a general estimate of the total number of days it will take to complete the project.
5. **Pages 18-19 - Protection of Natural Resources:** Fully disclose the environmental protection and mitigation measures American Potash intends to implement during their project (see 43 CFR 3505.45 (c) (2)). Items to address are those listed in the regulation, and the following: erosion and sediment control methods used during drilling, topsoil stockpile stabilization methods, management of biological soil crusts and air quality.
6. **Page 20 – Reclamation Goals – last bullet point:** The development of a reclamation monitoring and reporting strategy should be clearly incorporated into the Exploration Plan. Then it could be implemented after reclamation is completed.
7. **Page 21 – Reclamation Principles –** Provide more detail regarding what American Potash considers to be “adequate” in terms of storage of salvaged soil materials, control of noxious weeds and invasive plants, and soil erosion and sediment control. In response to this, if stating best management practices (BMPs) would be used, specify what those BMPs are. Consider adding more details as to how reclamation would be conducted, for example, among the items discussed during the on-sites were leaving the pad and access road in a roughened condition instead of grading it smooth and the application of a soil tackifier until pads are seeded.
8. **Page 21 – Reclamation Principles –** Provide more detail on what American Potash would do under reclamation maintenance and reclamation monitoring.
9. **Page 22 – Drill Pad and Drill Pad Access Road –** Include that American Potash would coordinate with the BLM to post “Restoration Area” signs at the junctions of the reclaimed access roads and the County B roads.
10. **General Comment under Reclamation –** Consider including here in this section a comment on the timing of the core-hole plugging. The assumption now is that plugging and abandonment of the core hole would be completed before moving the rig off location.

11. **Page 57 – Surface Use Plan – Drill Pads** – Include how biological soil crusts soils and sub-soils would be handled and include what how American Potash will prevent wind erosion from the soil stockpiles.
12. **Page 57 -Road Construction, Improvements and Turnouts** - Provide the BLM with shapefiles of the core hole locations, proposed new road construction and the road segments that will require upgrades. Identify where culverts need to be installed. Also, identify which cattle guards if any that would have to be driven around because they are too narrow to allow the drill rig and equipment to drive through/over them.
13. **Page 60 – Dust Mitigation** – Identify the fluids that would be used to control dust.

If you have any questions regarding this request for information, please contact Rebecca Doolittle at (435) 259-2141.

Sincerely,

/s/ Jeffrey R. Smith

Jeffrey R. Smith  
Field Office Manager

cc. Tom Munson, DOGM